

COMPREHENSIVE CRIMINAL REPORT

E'LISE CHARD

(YWCA MISSOULA OPERATIONS MANAGER)

Institutional Coordinator & Montana Phase Escalator

2017–2025

PERPETRATOR PROFILE

- **Name:** E'Lise Chard
- **Position:** Operations Manager, YWCA Missoula
- **Primary Jurisdiction:** Montana (Missoula County)
- **Role:** Institutional coordinator, Montana phase escalation, proxy harassment

RELATIONSHIP HISTORY

- Minimal contact with Nuno (2001–2018)
- Sister to Danielle Chard (primary perpetrator Phase 1)
- 2001: Told Nuno she had disowned Danielle at age 18
- Called Danielle “pathological liar and abusive to men”
- 2017–2018: Activated Montana campaign when Danielle’s credibility exhausted

DOCUMENTED CRIMINAL ACTIONS

June 12, 2018: Perjurious Protection Order

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Timeline: Filed 9 days after Nuno’s protected YWCA complaint (\$400 donation)

First Amendment Retaliation Pattern: Temporal proximity establishes causation

Written Claims (Petition):²

¹See Exhibit 10, Section 1.4-1.5: ELise-OP-Filing-Page1.jpeg and ELise-OP-Filing-Page2.jpeg (sworn petition pages); Section 2.8: Nuno-YWCA-Complaint.jpg (protected First Amendment petition filed June 3, 2018).

²Written petition filed under penalty of perjury June 12, 2018, Missoula County. See Exhibit 10, Section 1.4-1.5.

- “Ongoing threats and harassment to her children”
- “Extensive criminal drug history known to all police and judges”
- “Multiple threatening communications”

Sworn Testimony (Judge Warren, asked TWICE):³

- “No contact beyond three 2017 emails”
- “No threats”
- Reality: Zero drug history; one coerced plea she tried to withdraw

Direct Perjury: Written petition contradicts sworn testimony

Federal Crime: 18 U.S.C. § 1341 (mail fraud via court documents)

State Crime: MCA 45-7-202 (perjury), MCA 45-8-212 (criminal defamation)

July–September 2018: Institutional Conspiracy

Coordination:

- Home raid and electronics seizure based on charges
- Detective Connie Brueckner (YWCA BOARD MEMBER)⁴ leads investigation
- Conflict of interest UNDISCLOSED to defense counsel
- E’Lise worked directly with Brueckner (no court disclosure)
- Officer Ethan Smith recruited by E’Lise (later removed for “obvious impropriety”)

Judicial Outcome: ALL CHARGES DISMISSED WITH PREJUDICE

Judge Warren Finding: Nuno’s YWCA complaint was protected First Amendment speech

Federal Crime: 18 U.S.C. § 242 (deprivation of rights under color of law)

State Crime: MCA 45-4-102 (criminal conspiracy)

³Transcript and court findings available in Montana case records. Judge Warren explicitly found Nuno’s YWCA complaint constituted protected First Amendment speech.

⁴See Exhibit 10, Section 6.1: ywca-missoula-consolidated-financial-statements-years-2023-2024.pdf (ProPublica nonprofit records confirm Brueckner’s YWCA board membership). This undisclosed conflict of interest pervades the entire investigation and constitutes institutional capture.

August 14, 2018: Suppression of Exculpatory Evidence

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Witness PS Character Reference received by YWCA:

“In approximately 2016, when I was pregnant and homeless, Elvis invited me into his home at no cost. He expected nothing in return. He was never physically or verbally abusive. At times of conflict, he handled himself very well, working through issues instead of making things worse. I hate what your employee E’Lise Chard has been doing to him for no reason.”

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YWCA Response: Complete silence and suppression

E’Lise’s Knowledge: As Operations Manager, received/reviewed reference

Legal Significance: Brady violation facilitated by institutional suppression

Federal Crime: 18 U.S.C. § 1503 (obstruction of justice)

Civil Liability: 42 U.S.C. § 1983 (deliberate indifference to civil rights)

September 2018: False Police Reports

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- Allegation: “Phantom phone calls” to her
- Subpoenaed Records: NO SUCH CALLS EXISTED
- E’Lise fabricated allegations to support escalation
- Detective Brueckner used fabrication to justify continued prosecution
- State Crime: MCA 45-5-204 (false reporting)

⁵**CRITICAL EVIDENCE.** See Exhibit 10, Section 2.7: Nuno-PS-Witness-Statement-YWCA-Email-Complaint.pdf. This August 2018 character reference describes Elvis sheltering a pregnant homeless woman (Witness PS) at no cost in 2016, demonstrating his generous, non-violent character—the exact opposite of E’Lise’s false narrative and the exact mission YWCA claims to perform. YWCA and Detective Brueckner suppressed this exculpatory evidence, constituting a Brady violation.

⁶Email dated August 14, 2018, sent to YWCA Missoula. Never disclosed to Elvis, his defense counsel, or the court despite active criminal proceedings. This constitutes institutional suppression of exculpatory evidence and Brady violation.

⁷Subpoenaed phone records showed no calls from Elvis to E’Lise during alleged timeframe. Fabrication documented in Montana prosecution discovery materials.

2020–2024: Tyleen Root Recruitment

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Pattern:

- E'Lise recruited YWCA client Tyleen Root
- Directed Tyleen to conduct business sabotage campaign
- Private DMs → public posts → targeted follower contact
- False claims: “Stalker and woman beater”
- Business Consequence: \$60,000/year contract loss

Federal Crime: 18 U.S.C. § 1962 (RICO continuing violation)

State Crime: MCA 45-4-102 (criminal solicitation), MCA 45-8-212 (defamation)

2025: Ongoing Retaliation

- Continues harassment through proxies
- Institutional protection continues
- Nuno’s complaints to Missoula PD met with intimidation (guns drawn)
- Pattern: Institutional protection of YWCA-affiliated harassers

DETECTIVE BRUECKNER CONFLICT

- **Role 1:** Missoula Police Detective (lead investigator)
- **Role 2:** YWCA Missoula Board Member (simultaneous)
- **Documented:** ProPublica records confirm board membership
- **Disclosure:** NONE to defense counsel or court
- **Legal Significance:** Unprecedented institutional capture

⁸See Exhibit 10, Section 5.1-5.19: Tyleen-Root-Harassment series (19 files documenting defamatory social media posts, business sabotage, and proxy harassment campaign).

INSTITUTIONAL CORRUPTION

- YWCA–Police nexus (board overlap)
- Evidence suppression (character reference)
- Officer recruitment (Ethan Smith)
- Ongoing protection (2020–2025 harassment tolerance)

DAMAGES ATTRIBUTABLE TO E’LISE

- Lost IT career: \$2,100,000
- Specific contracts lost: \$680,000+
- Legal fees: \$387,000
- Medical/psychological: \$148,000
- Business interference: \$500,000
- Legal malpractice losses: \$6,400,000–\$8,400,000
- **Total: \$10,215,000–\$12,215,000**

RECOMMENDED CHARGES

Federal

- 18 U.S.C. § 241: Conspiracy against rights (interstate with Danielle)
- 18 U.S.C. § 242: Deprivation of rights under color of law (YWCA–police nexus)
- 18 U.S.C. § 1341: Mail fraud (perjurious petition)
- 18 U.S.C. § 1343: Wire fraud (false police reports)
- 18 U.S.C. § 1503: Obstruction of justice (evidence suppression)
- 18 U.S.C. § 1962: RICO predicate acts

State (Montana)

- MCA 45-7-202: Perjury (written vs. sworn contradictions)
- MCA 45-8-212: Criminal defamation (false criminal history claims)
- MCA 45-4-102: Criminal conspiracy and solicitation (Tyleen Root)
- MCA 45-5-203: Witness intimidation (continuing campaign)
- MCA 45-5-204: False reporting (phantom calls)

Institutional Liability

- YWCA Missoula (entity): Suppression of exculpatory evidence
- City of Missoula (Monell liability): Detective Brueckner undisclosed conflict
- Missoula Police Department: Pattern/practice institutional corruption

EVIDENCE AVAILABLE

Court records, sworn testimony, written petition, phone records (no calls), character reference, ProPublica board documentation, judicial findings.

